

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

NOTICE OF IMPASSE REGARDING CERTAIN  
PROOFS OF CLAIM ASSERTING *FRANCES CARLO ET AL. V. COLONEL JOSE L. CALDERO ET AL.*, NO. 3:16-CV-02867 (D.P.R)

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To the Honorable United States District Judge Laura Taylor Swain:

1. On April 1, 2020, this Court entered the *Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Form of Notice, and (C) Granting Related Relief* [ECF No. 12576], which was subsequently amended by *Order Granting Motion of the Financial Oversight and Management Board for Puerto Rico to Amend Alternative Dispute*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (v) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). On October 30, 2024, the Title III case for the Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) was closed.

*Resolution Procedures* [ECF No. 23113] and further amended by *Order Amending Alternative Dispute Resolution Procedures* [ECF No. 28125] (the “ADR Order”).

2. The ADR Order authorizes the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, HTA, ERS, and PREPA, the “Debtors”) to resolve claims using the procedures approved by the court in the ADR Order [ECF No. 23113-1] (“ADR Procedures”).

3. Pursuant to the ADR Order, the Debtors transferred certain proofs of claim asserting damages associated with the claims and causes of action alleged in the litigation captioned *Frances Carlo et al. v. Colonel Jose L. Caldero et al.*, No. 3:16-Cv-02867 (D.P.R) (the “Claims”), listed on Exhibit A attached hereto, into the ADR Procedures through the *Thirty-Fifth Notice of Transfer of Claims to Alternative Dispute Resolution* [ECF No. 25015], filed on October 24, 2023.

4. In accordance with the Offer Exchange Procedures,<sup>2</sup> the Debtors served upon the claimants associated with the Claims (the “Claimants” and together with the Debtors, the “Parties”) ADR Notices containing confidential offers of settlement (the “Offer”). The ADR Notices permitted the Claimants to designate whether they accepted the Offers, rejected the Offers, or submitted a counteroffer. The Claimants responded by rejecting the Offers.

5. Accordingly, having been unable to reach a consensual resolution regarding the

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the ADR Procedures.

Claims and in compliance with the ADR Procedures, the Debtors submit this *Notice of Impasse* to notify the Court that the Claims are ready to proceed to Evaluative Mediation, as set forth in Section 3 of the ADR Procedures. Further, because the Claims all assert the same claims and causes of action alleged in the litigation and are represented by the same counsel, the Debtors believe it would be most efficient for the Claims to be referred to the same mediator and for the Evaluative Mediation to proceed on a consolidated basis with respect to all Claims.

*[Remainder of Page Intentionally Left Blank]*

Dated: March 10, 2025  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

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**EXHIBIT A**

Claim No.	Claimant Name
165951	GONZALEZ ROSARIO, FERNANDO L.
45963	ALGARIN GARCIA, FERNANDO
45965	VELAZGUEZ WEBB, JOSEPH A.
45966	RIVERA SANTIAGO , PABLO
45967	PINEO GONZALEZ , ANTONIO
45969	FIGUEROA DAVILA, ERNESTO
45981	BELEN CASTRO, SYLVIA
45991	VELEZ ALVAREZ, HECTOR M
45998	ACEVEDO MENDEZ, RAUL
46000	MARTINEZ MORALEZ, HECTOR L.
46002	MELEUDEZ HERNANEZ, JOSE A.
46007	MATINEZ RAMIREZ, GUALBERTO
46037	ARROYO CANDELARIO, JORGE
46065	ORTIZ REYES, PEDRO
46106	BAEZ TORRES, ARESENIO
46114	PEREZ LUGO , SANTOS

Claim No.	Claimant Name
46120	VELEZ AROCHO, GERARDO
47610	GONZALEZ DELVALLE, OLGA G
47740	CORTEZ CABAN, VICTOR
47904	MORALES CARDONA, MANUEL
50253	PACHECO MUNIZ, EDNA
50322	GONZALEZ VELEZQUEZ, AURELIO
50475	MEDINA MANTILLA, GUILLERMO
50996	RIVERA PRINCIPE, JOSUE CALEB
51179	HIGHLY, STELLA
51427	TORRES, MILAGROS SANTIAGO
51937	SANTIAGO CALDERO, LUIS A.
52409	CARABALLO TERRES, OSCAR E.
54548	LOPEZ PAGAS, JOSE R.
54856	MIRANDA GARCIA, JOSUE
54866	CRUZ MORALES, MIGUEL A.
55154	SOTO SERRANO, JUAN M.

Claim No.	Claimant Name
55372	ESTREMER LISTERA, VICTOR M.
55958	VALEZ FIGUEROA, CARLOS E.
56144	MALAVE, ANGEL F
56190	VAZQUEZ ORTIZ, EDGAR ADOLFO
56359	REYES RODRIGUEZ, JOSE R.
57599	VARGAS, EDWIN GORDILLO
57636	PERAZA AYALA, ANGEL
57645	CARRILLO FLORES, MARIBEL
57683	ORTIZ PASTRANA, EDWIN
58143	VELEZ MONTALVO, WALDY
58327	RAMOS, EMILY
58348	GONZALEZ ROLDAN, JOSE A
58414	RODRIGUEZ SOTO, ROBUSTINO
58623	ALLEN RODRIGUEZ, HERIBERTO
58629	CARLO, FRANCES
58640	HERNANDEZ SANCHEZ, DAVID



Claim No.	Claimant Name
58643	GARNETT FOJO, AARON I
58648	LOPEZ DELGADO, OBDULIO
58649	SANTIAGO NOSADO, FELIX
58652	TORRES LOPEZ, MANUEL E.
58662	ALVEREZ, NAYDA C.
58716	DOMINGUEZ COLON, ANTHONY
58719	RIVERA COLON, ANGEL
58723	AREVALO ECHEVARIA, JOSE F.
58725	LEBRON DUARTE, ANTOLINO
58732	LOPEZ, JOEL
58735	RAMOS RIVERA , CARLOS JOSE
58738	VELEZ VERA, JEANMARIE
58784	VILLALONGO RIVERA, CAROLOS J
58790	SANTIAGO ORTIZ, ALEJANDRO
58794	BONILLA, RICARDO
58798	RIVERA, SANTOS WALKER

Claim No.	Claimant Name
58808	DE VALLE SERRANO, GERARDO
58817	FELCIANO PACHECO, ANGEL
58819	RIVERA RIOS , ANTONIO R.
58825	ORTIZ NIEVES, SAMUEL
58837	BERROCALES (FALLECIDO), ABIMAEI CASTRO
58845	RIVERA, LYDIA
58880	ORTIZ VILANOVA, WILFREDO
58887	FERRER ALMA, CARMEN L.
58904	ACCUEDO ROSA, GEANOEL
58910	CRUZ MORALES, HILDA LYNARI
58914	MARTINEZ, ANGEL
58915	RAMOS, WILLIAM MORENO
58925	PEREZ NIEVES, JOSE I.
58975	VILLANUEVA LAPORTE, DAVID
58977	TORRES, ANGEL L.
59158	QUINONEZ, ANTONIO

Claim No.	Claimant Name
59292	HERNANDEZ, RAMFIS
59294	REYES MENDOZA, ROBERTO
59347	ADORNOL MONTANEO, JOSE RAFAEL
59366	OSORIA MOLINA, ANA L.
59367	ORTIZ, EDWARD
59371	RAMOS CABNEM, JOSE R.
59431	TORRES LOPEZ, ANGEL L.
59503	LUGO ALMADVAR, PEDRO A.
59504	LAGUER RAMOS, RADAMIS
59513	MEDADINA, GABRIEL
59514	ARCHEUAL, GERARDO SAEZ
59532	RAMEN SANTIAGO, ANA DEBRA
59533	LEDESMA MARTINEZ, LUIS A
59544	RODRIGUEZ ROJAS, ARELIS
59548	CASTRO ALONSO, AMANCIA B.
59607	ACOEDO OLIVENLIA, EDGARDO

Claim No.	Claimant Name
59625	ACURDO OLIVENCIA, JOSE L.
59638	GUIITERREZ LOPEZ, JOSE
59640	SERRONO, GERARDO VALLE
59644	NIEVES PABON, IDALIS G
59691	COLLADO NEGRON, MANUEL DE JESUS
59731	FLORES MORALEZ, LUIS
59895	LASSALLE CHAPARRO, LUIS A.
59899	RODRIGUEZ RODRIGUEZ, OSDALYZ
60584	BERROCALES GOMEZ, FLOR
60887	GARAYUA PACHECO, CARLOS R.
61142	VERGAS TORRES, DAVID
61479	VALEZ HOMES, NOEL
62836	SANCHEZ, MARLIN L
64937	SOTO RODRIQUEZ, CESAR
64938	MOJICA, DANIEL RYAN
65643	RIVERA, ELIEZER

Claim No.	Claimant Name
65795	CARRASQUILLO ORTA, ANGEL G.
66207	SANABRIA SANCHEZ, LIZ N.
66219	SANES, MARISOL
66264	PENA HERNANDEZ, LUIZ A.
66339	PEREZ AYALA, MORAINA
67252	GONZALEZ DEL VALE, OLGA G
69061	LEBRON RODRIQUEZ, CARLOS R.
69274	SANTANA IRIZARRY, ANGEL S.
69725	PENA HERNANDEZ, LUZ A.
73425	TORRES FIGUEROA, MYRIAM
73536	GUERRERO MISKINIS, LAURA L.
73697	VLAZQUEZ PIERANTONI, LUIS M.
73933	VELOZGUEZ FERCADO, LUIS ANTONIO
74309	ROJAS DIAZ, ANGEL L.
84838	CARLO RODRIGUEZ, FRANCES
86813	VELEZ RIVERA, LUIS ONIEL